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DECLARATION OF TOM VORM

I, TOM VORM, declare and say:

1. I am a member of the Church of Scientology of California, and in 1979, I assumed the post of Archives I/C, which operated out of the Controller's Office. At that time, and up until May, 1981, Mary Sue Hubbard held the post of Controller.

2. In my capacity as Archives I/C I exercised direct control over materials which were known as the Controller's Archives. These materials were mainly made up of materials from the period 1959 to 1967 or so, and included both a large variety of personal items of L. Ron and Mary Sue Hubbard, as well as various manuscripts, notes, memoranda, etc. of Mr. Hubbard and, to some extent, Mrs. Hubbard.

3. These materials had come to the Controller's Archives in storage trunks that had been on board the ship on which Mr. and Mrs. Hubbard sailed for several years. I was at all times aware that these trunks were considered to be personal property of Mr. and Mrs. Hubbard. At various times, there was an effort to sort out from these materials certain items, mainly manuscripts and tapes of Scientology and Dianetics materials, which could be utilized by the Church. Any such activity was done by me only with the prior permission of Mrs. Hubbard. It was always the policy that Mrs. Hubbard had to personally approve the use of any materials from the Controller's Archives, as it was known that much of it was

1 personal material and not material that would be made avail-
2 able to the Church.

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4 4. On one occasion in December, 1979, Mrs. Hubbard
5 notified me concerning these materials. Mrs. Hubbard indi-
6 cated to me that there were personal materials in those
7 trunks and these were not to be made available to the Church.
8 She stated that provisional release of any of the materials
9 from these trunks should be cleared with her first, and that
10 was always the policy that I followed.

11 5. After May, 1981, neither Mr. nor Mrs. Hubbard were
12 available for me to communicate with. Gerry Armstrong, who
13 was working on a post concerning research for Mr. Hubbard's
14 biography, requested of me several times that personal mate-
15 rial from these trunks be given to him. I wrote to Mrs.
16 Hubbard, but as I did not receive a reply, I assumed there
17 was no way at the time to get my communication to her. Even-
18 tually, not knowing what to do, I asked the individual who
19 was then occupying the Controller's post what I should do,
20 and he indicated to me that the material should be provided
21 to Mr. Armstrong.

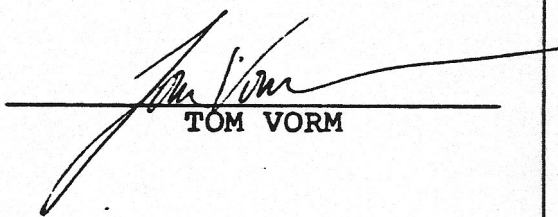
22 6. Although I was uncomfortable with this, as I knew
23 that much of the material was the personal possession of Mr.
24 and Mrs. Hubbard, I felt obliged, under the circumstances, to
25 provide the material to Gerry Armstrong. At no time, so far
26 as I am aware, did either Mr. or Mrs. Hubbard personally ap-
27 prove this procedure, but, in their absence, the situation

1 was confused and I did not know what else to do.

2
3 7. I understand that Mrs. Hubbard, having now been
4 advised that such material was provided to Gerry Armstrong,
5 has indicated that it was done without her consent and that
6 she does not approve of it. This does not surprise me, as it
7 is consistent with the position that she took concerning
8 these materials when I communciated with her from the period
9 1979 through May, 1981.

10 I declare, under penalty of perjury, that the foregoing
11 is true and correct.

12 Executed at Los Angeles, California on November , 1982.

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TOM VORM